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CENTRAL DISTRICT OF CALIF.
CLERK OF COURT

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

October 2018 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

JONATHAN LOWE and
ARIELLE TEPEL,

Defendants.

CR No.

18CR00914-DSF

I N D I C T M E N T

[21 U.S.C. § 846: Conspiracy to Distribute and Possess with Intent to Distribute Heroin; 21 U.S.C. §§ 841(a)(1), (b)(1)(C): Distribution of Heroin Resulting in Death; 21 U.S.C. §§ 841(a)(1), (b)(1)(C): Distribution of Heroin; 18 U.S.C. § 2(a): Aiding and Abetting]

The Grand Jury charges:

COUNT ONE

[21 U.S.C. § 846]

A. OBJECTS OF THE CONSPIRACY

Beginning on a date unknown to the Grand Jury, and continuing until on or about November 28, 2017, in Los Angeles County, within the Central District of California, and elsewhere, defendants JONATHAN LOWE ("LOWE") and ARIELLE TEPEL ("TEPEL"), and others known and unknown to the Grand Jury, conspired and agreed with each other to knowingly and intentionally distribute and possess with intent to distribute heroin, a Schedule I narcotic controlled substance, in

1 violation of Title 21, United States Code, Sections 841(a)(1),
2 (b)(1)(C).

3 B. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE
4 ACCOMPLISHED

5 The objects of the conspiracy were to be accomplished, in
6 substance, as follows:

7 1. Defendant LOWE would obtain heroin and arrange to sell
8 heroin to customers.

9 2. Defendant TEPEL would drive defendant LOWE to pre-arranged
10 locations so that defendant LOWE could sell heroin to customers.

11 3. Defendants TEPEL and LOWE would use the proceeds of the
12 sales.

13 C. OVERT ACTS

14 On or about the following dates, in furtherance of the
15 conspiracy and to accomplish its objects, defendants LOWE and TEPEL,
16 and others known and unknown, committed various overt acts in Los
17 Angeles County, within the Central District of California, including,
18 but not limited to, the following:

19 Overt Act No. 1: On or before November 5, 2017, defendant LOWE
20 obtained heroin from known and unknown co-conspirators to distribute
21 to drug customers.

22 Overt Act No. 2: On or about November 5, 2017, defendant TEPEL
23 drove defendant LOWE to the parking lot of a Target retail store
24 located in Westlake Village, California, so that defendant LOWE could
25 sell heroin to K.S.

26 Overt Act No. 3: On or about November 5, 2017, defendant LOWE
27 sold heroin to K.S.

1 Overt Act No. 4: On or about November 28, 2017, defendant LOWE
2 agreed to sell heroin to a person he believed was a drug customer,
3 but who was in fact an undercover law enforcement agent ("UC").

4 Overt Act No. 5: On or about November 28, 2017, defendant TEPEL
5 drove defendant LOWE to a parking lot in Woodland Hills, California
6 to meet the UC.

7 Overt Act No. 6: On or about November 28, 2017, defendants
8 TEPEL and LOWE possessed heroin in defendant TEPEL's car.

COUNT TWO

[21 U.S.C. §§ 841(a)(1), (b)(1)(C)]

On or about November 5, 2017, in Los Angeles County, within the Central District of California, defendant JONATHAN LOWE knowingly and intentionally distributed heroin, a Schedule I narcotic drug controlled substance, to K.S., whose death and serious bodily injury resulted from the use of such substance.

COUNT THREE

[21 U.S.C. §§ 841(a)(1), (b)(1)(C); 18 U.S.C. § 2(a)]

On or about November 5, 2017, in Los Angeles County, within the Central District of California, defendant ARIEL TEPEL knowingly and intentionally aided, abetted, counseled, and procured the distribution of heroin, a Schedule I narcotic drug controlled substance.

A TRUE BILL

15/
Foreperson

NICOLA T. HANNA
United States Attorney

LAWRENCE S. MIDDLETON
Assistant United States Attorney
Chief, Criminal Division



SCOTT M. GARRINGER
Assistant United States Attorney
Deputy Chief, Criminal Division

CHRISTINA T. SHAY
Assistant United States Attorney
Deputy Chief, General Crimes
Section

WILLIAM M. ROLLINS
Assistant United States Attorney
General Crimes Section